

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

-----X 12 CIV 4635 (DLC)

Kevin Watkins,

Plaintiff,

NOTICE OF MOTION TO
ADMINISTRATIVELY
DISMISS OR
CONSOLIDATE CASES

-against-

Derek Smith, et al.

Defendants.

-----X 12 CIV 7659 (DLC)

Jessica Dugue,

Plaintiff,

-against-

Kevin Watkins,

Defendant.

-----X

PLEASE TAKE NOTICE that upon the annexed affirmation of Anil Taneja, Esq., affirmed on October 19, 2012, and upon the exhibits attached thereto, the accompanying Memorandum of Law in support of this motion, plaintiff will move this Court, before the Honorable Denise Cote United States District Judge at the United States District Court for the Southern District of New York, located at 500 Pearl Street, New York, New York, for an order pursuant to Rule 42(a) of the Federal Rules of Civil Procedure ordering that Dugue v. Watkins, 12 Civ. 7659, be administratively dismissed or consolidated with Watkins v. Smith, et. al., 12 CIV 4635 (DLC) and that defendants Jessica Dugue, Bryan Arce, Arce Law Group, PC, Derek Smith, and Derek Smith Law Group, PC, be sanctioned, and for such other and further relief as the Court deems just.

Dated: New York, New York
October 19, 2012

Respectfully Submitted,

/s/

Anil Taneja, Esq. (AT1760)
Attorney for Plaintiff
244 5TH Avenue, 2nd Floor
New York, NY 10001
(212) 592-4000